REMARKS

[0001]   Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 1, 3-6, 8, 10, 12-15, 22, 24-25 and 41 are currently pending

- Claims 1, 4, 5, 8, 10, 12, 13, 14, and 22 are amended herein

- Claims 17-21 and 26-40 are withdrawn herein

- Claims 2, 7, 9, 11, 16, and 23 are canceled herein

Statement of Substance of Interview

[0002]   Initially, Applicant wishes to thank the Examiner for conducting an interview with Applicant's representative Elizabeth Zehr, on Tuesday July 14, 2009.

[0003]   During the interview, Applicant's representative and the Examiner discussed the §103 rejection as applied to claims 1, 10, and 22. Applicant's representative and the Examiner did not reach an agreement as to the amendments to claims 1, 10, and 22; however, the Examiner indicated that more detail in the claims relating to the rendering-style records may move this case closer to allowance. Applicant has amended the claims accordingly.

[0004]   The subject matter of the interview, and other remarks, are included below under their respective sections to assist the Examiner in more fully understanding the Applicant's position on the rejections.

Cited Documents

[0005]   The following documents have been applied to reject one or more claims of the Application:

- Blair: Blair et al, U.S. Patent Application Publication No. 2004/0133855 7/08/2004.

- W3Schools: "CSS Pseudo-Classes", W3Schools.com, Archived 12/21/2002.

- Lakritz: Lakritz, David, U.S. Patent No. 6,623,529 9/23/203.

- IE5: "New Feature in Internet Explorer 5" 11/14/2003.

- Allen: Allen et al, U.S. Patent Application Publication No. 2005/0044499 2/24/2005.

§ 103 Rejections: Blair, W3Schools, Lakritz, and IE5

[0006]   Claims 1, 3-7, 10, 12-15, 22, 24-25 and 41 stand rejected under 35 U.S.C. §103 as allegedly being obvious over Blair and further in view of W3Schools and further in view of Lakritz and further in view of IE5.   Applicant respectfully traverses the rejection.

Independent Claim 1

[0007]   Applicant submits that the Office has not made a *prima facie* showing that independent claim 1 is obvious in view of the combination of Blair, W3Schools, Lakritz, and IE5. Applicant submits that the combination of Blair, W3Schools, Lakritz, and IE5 does not teach or suggest the following features of this claim, as amended (with emphasis added):

A method of compiling formatted video content into a binary format, comprising:

receiving a formatted video content, the formatted video content comprising Extensible Hypertext Markup Language (XHTML) with Cascading Style Sheets (CSS), the formatted video content including a plurality of display objects, each display object having one or more conditions; and

processing the formatted video content with a process that is specific to the format of the video content by *pre-cascading the CSS with the XHTML to generate one or more rendering-style records for each of the one or more conditions of each display object*, wherein one or more types of interactive input can be the one or more conditions upon which the rendering-style record for each display object is generated.

[0008]   Claim 1 recites in part, "pre-cascading the CSS with the XHTML to generate one or more rendering-style records for each of the one or more conditions of each display object." The Office cites Blair as teaching this element. (Office Action, page 3, lines 8-9). Blair generally pertains to a "transcoder that converts text-based computer software instructions or code intended for use by a presentation engine into a binary code adapted for use by a constrained function presentation engine." (*Blair*, Abstract). Specifically a "server (e.g., the near-side server 108) receives an HTML-compatible mark-up file, any CSS style sheets, any in-line styles and the like" and "delivers the preprocessed XML/CSS files within the context of a compressed binary file including presentation information optimized for the particular set top box." (*Blair*, paragraphs [0031] and [0038]).

[0009]   The Office relies on the conversions performed by the near side server of Blair discussed in paragraph [0016] of the cited art as allegedly teaching the elements of claim 1. Applicant provides the relevant portion of Blair that is cited by the Office:

In one embodiment, extensible mark-up language (XML) information streams and/or data files intended for use by one or more

> client devices are converted or transcoded by a near side server into
> feature or function reduced information streams and/or data files which
> are subsequently propagated to the client. The conversion/transcoding
> operates to shift a portion of the processing burden associated with the
> use of the information streams and/or data files from the client
> device(s) to the near side server, thereby enabling the use of so-called
> thin client devices (i.e., client devices such as set top boxes having a
> relatively limited memory or processing power). In general, the
> invention converts unresolved styles into resolved styles such that the
> processing burden placed upon the client device is lessened.

(*Blair*, paragraph [0016]). Although the information stream of Blair may contain CSS files, there is nothing in Blair to suggest that the transcoding performed by the near side server of Blair includes "pre-cascading the CSS with the XHTML to generate one or more rendering-style records for each of the one or more conditions of each display object" as recited in claim 1. Rather, Blair simply maintains that the "extensible mark-up language (XML) information streams and/or data files intended for use by one or more client devices are converted or transcoded by a near side server into feature or function reduced information streams and/or data files" without any further details on the converting or transcoding element. (*Blair*, paragraph [0016]).

[0010]   Consequently, the combination of Blair, W3Schools, Lakritz, and IE5 does not teach or suggest all the elements and features of this claim. Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.   Due to the Applicant's earnest belief that the claim 1, as rejected under Section 103, is believed allowable for reciting elements which are not taught or suggested in the combination of Blair, W3Schools, Lakritz, and IE5, Applicant will not address motivation to combine the Blair, W3Schools, Lakritz, and IE5 reference with respect to claim 1 during this response.   However, Applicant hereby reserves the right to further challenge the motivation to combine the Blair, W3Schools, Lakritz, and IE5 references.

Dependent Claims 3-7 and 41

[0011]   Claims 3-7 and 41 ultimately depend from independent claim 1. As discussed above, claim 1 is allowable over the cited art. Therefore, claims 3-7 and 41 are also allowable over Blair and further in view of W3Schools and further in view of Lakritz and further in view of IE5 at least for their dependency from independent claim 1. These claims may also be allowable for the additional features that they recite.

[0012]   Accordingly, claims 3-7, and 41 are allowable for at least the foregoing reasons.

Independent Claim 10

[0013]   Applicant submits that the Office has not made a *prima facie* showing that independent claim 10 is obvious in view of the combination of Blair, W3Schools, Lakritz, and IE5. Applicant submits that the combination of Blair, W3Schools, Lakritz, and IE5 does not teach or suggest the following features of this claim, as amended (with emphasis added):

> A computer storage medium storing instructions that when executed cause one or more processors to:
> receiving a formatted video content, the formatted video content comprising Extensible Hypertext Markup Language (XHTML) with Cascading Style Sheets (CSS), the formatted video content including a plurality of display objects, each display object having one or more conditions;
> *pre-cascade the CSS with the XHTML, via* a first routine specific to the format of the video content, *to generate one or more rendering-style records for each of the one or more conditions of each display object*, wherein one or more types of interactive input can be the one or more conditions upon which the rendering-style record for each display object is generated;
> compile the processed video content with a second routine, wherein the second routine is a client-specific routine specific to a predetermined client, the client-specific routine to create one or more serialized binary bit streams corresponding to the video content,

wherein the serialized binary bit streams preserves the user interface interaction elements of the video content; and

transmit, via a head-end in a transmission over a satellite/Cable TV (CATV) network, the one or more serialized binary bit streams to the predetermined client.

[0014] Claim 10 recites in part, "pre-cascade the CSS with the XHTML, via a first routine specific to the format of the video content, to generate one or more rendering-style records for each of the one or more conditions of each display object." The Office cites Blair as allegedly teaching the elements of claim 10.

[0015] Applicant respectfully relies on at least similar reasoning as presented above in support of claim 1 as applied to claim 10 to the extent that claim 10 recited similar subject matter as claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection to claim 10.

Dependent Claims 12-15

[0016] Claims 12-15 ultimately depend from independent claim 10. As discussed above, claim 10 is allowable over the cited art. Therefore, claims 12-15 are also allowable over Blair and further in view of W3Schools and further in view of Lakritz and further in view of IE5 at least for their dependency from independent claim 10. These claims may also be allowable for the additional features that they recite.

Independent Claim 22

[0017] Applicant submits that the Office has not made a *prima facie* showing that independent claim 22 is obvious in view of the combination of Blair, W3Schools, Lakritz, and IE5. Applicant submits that the combination of Blair, W3Schools, Lakritz, and IE5 does not teach or suggest the following features of this claim, as amended (with emphasis added):

A Multiple System Operation system, comprising:

storage for video content in an original markup language that includes layout, rendering, UI interaction, and dynamic aspects of the video content, wherein the video content includes a plurality of display objects, each display object having one or more conditions; and

one or more headends each having one or more servers, wherein each server includes a compiler to compile the video content in the original markup language into video content in a binary format that includes the layout, rendering, UI interaction, and dynamic aspects of the video content from the original markup language, the compiler to (1) determine a client-specific routine specific for a predetermined client for rendering the video content in the binary format to be consistent with the original markup language, and to (2) process the video content in the original markup language with (a) a markup-specific routine that is specific to the original markup language, and (b) the client-specific routine determined via the compiler of the server, wherein the markup-specific routine *pre-cascades the* original markup language *to generate one or more rendering-style records for each of the one or more conditions of each display object, wherein one or more types of interactive input can be the one or more conditions upon which the rendering-style record for each display object is generated.*

[0018]   Claim 22 recites in part, "the markup-specific routine pre-cascades the original markup language to generate one or more rendering-style records for each of the one or more conditions of each display object." Applicant respectfully relies on at least similar reasoning as presented above in support of claim 1 as applied to claim 22 to the extent that claim 22 recited similar subject matter as claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection to claim 22.

Dependent Claims 24 and 25

[0019]   Claims 24 and 25 ultimately depend from independent claim 22. As discussed above, claim 22 is allowable over the cited art. Therefore, claims 24 and 25 are also allowable over Blair and further in view of W3Schools and further in view of Lakritz and further in view of IE5 at least for their dependency from independent claim 22. These claims may also be allowable for the additional features that they recite.

§ 103 Rejections: Blair, W3Schools, Lakritz, IE5 and Allen

[0020] Claim 8 stands rejected under 35 U.S.C. § 103 as allegedly being obvious over Blair, W3Schools, Lakritz and IE5 and further in view of Allen. Applicant respectfully traverses the rejection.

Dependent Claim 8

[0021] Claim 8 recites:

> The method as defined in Claim 1, wherein the processing the formatted video content with a client-specific routine to convert the formatted video content to binary data includes applying styling nodes to each of the elements of the formatted video content, wherein the elements of the formatted video content which have similar styling are applied to the same styling node.

Applicant submits that claim 8 must be read based on the current amendments to claim 1, from which it depends.

[0022] In rejecting claim 8, the Office cites Blair as allegedly teaching the client-specific routine. Applicant provides the relevant portion of Blair cited by the Office:

> The client code . . . queries the set top box to determine the capabilities of the STB or other parameters associated with the STB to determine thereby which of the multiple style sheets are appropriate for the XML file to request from the server. The server then resolves the proper combination of XML/CSS files and delivers the preprocessed SML/CSS files within the context of a compressed binary file.

(*Blair*, paragraph [0038]).

[0023] As noted above, Blair creates the XML/CSS files based on the client's determination of "which of the multiple style sheets are appropriate for the XML file to request from the server." (*Id.*). However, Blair doesn't provide any clarification on how the XML/CSS files are created based on the information provided via the client. Blair

simply maintains that the server "resolves the proper combination of XML/CSS files." (*Id.*). In other words, Blair fails to teach or suggest that the client-specific routine applies "styling nodes to each of the elements of the formatted video content, wherein elements of the formatted video content which have similar styling are applied to the same styling node" as recited in claim 8. Consequently, Applicant provides that dependent claim 8 is further allowable over the cited art.

[0024]   W3Schools, Lakritz, IE5, and Allen fail to remedy the deficiencies in Blair noted above with respect to claim 10.

[0025]   Consequently, the combination of Blair, W3Schools, Lakritz, IE5, and Allen does not teach or suggest all the elements and features of this claim. Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Conclusion

[0026]   Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned representative for the Applicant before issuing a subsequent Action.

Respectfully Submitted,

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simply maintains that the server "resolves the proper combination of XML/CSS files." (*Id.*). In other words, Blair fails to teach or suggest that the client-specific routine applies "styling nodes to each of the elements of the formatted video content, wherein elements of the formatted video content which have similar styling are applied to the same styling node" as recited in claim 8. Consequently, Applicant provides that dependent claim 8 is further allowable over the cited art.

[0024]   W3Schools, Lakritz, IE5, and Allen fail to remedy the deficiencies in Blair noted above with respect to claim 10.
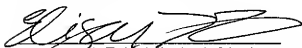
[0025]   Consequently, the combination of Blair, W3Schools, Lakritz, IE5, and Allen does not teach or suggest all the elements and features of this claim. Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Conclusion

[0026]   Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned representative for the Applicant before issuing a subsequent Action.

Respectfully Submitted,

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